

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

UNITED STATES OF AMERICA)	CRIMINAL NO.: <u>7:22cr779-DCC</u>
)	
vs.)	
)	
LIONEL MARTIN ROSENADA)	
CABALLERO)	
a/k/a "Mr. Hustler")	

UNITED STATES MOTION TO SEAL DOCUMENT

NOW COMES the United States, by and through its undersigned counsel, hereby moves this Court to seal an Addendum to a Plea Agreement pursuant to the Standing Order Regarding Sealing Documents Filed in Criminal Matters, filed October 28, 2014, in 3:14-mc-00333-TLW [ECF #1]. The purpose of the Government's request is to protect the privacy interests of the person involved. The United States respectfully submits that the privacy interests of the individual involved trumps the public's limited interest in access to materials related to this matter. The United States notes that the Court has the inherent authority to seal these documents. *See Baltimore Sun v. Goetz*, 886 F. 2d 60 (4th Cir. 1988); and In re Application of the United States for an Order Pursuant to 18 U.S.C. Section 2703(D), 707 F. 3d 283 (4th Cir. 2013). The United States therefore requests that the Court direct that the forthcoming document be sealed pursuant to the Standing Order until further order of the Court.

Respectfully submitted,

ADAIR F. BOROUGHS
UNITED STATES ATTORNEY

By: s/ Christopher B. Schoen

Christopher B. Schoen
Assistant U.S. Attorney
D.C. Bar No. 11421
55 Beattie Place, Suite 700
Greenville, SC 29601
(864) 282-2100

September 5, 2023